

WEIL, GOTSHAL & MANGES LLP
Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: 415 496 6723
Fax: 650 636 9251

LATHAM & WATKINS LLP
Joshua G. Hamilton (#199610)
(joshua.hamilton@lw.com)
Michael J. Reiss (#275021)
(michael.reiss@lw.com)
10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Tel: 424 653 5500

LATHAM & WATKINS LLP
James E. Brandt (*pro hac vice*)
(james.brandt@lw.com)
1271 Avenue of the Americas
New York, NY 10020
Tel: 212 906 1200

Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM)*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS
IN SUPPORT OF REORGANIZED
DEBTORS' FORTIETH SECURITIES
CLAIMS LIMITED OMNIBUS OBJECTION
TO CLAIMS ADOPTING THE SECOND RKS
AMENDMENT**

1 I, Robb McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP
5 (“**AlixPartners**”), which is an affiliate of both AlixPartners, LLC and AP Services, LLC (“**APS**”).
6 APS was previously retained to provide interim management services to PG&E Corporation and
7 Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, “**PG&E**,” the
8 “**Debtors**,” and as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-
9 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit this Declaration in support of the
10 Reorganized Debtors’ Fortieth Securities Claims Limited Supplemental Omnibus Objection to
11 Claims Adopting the Second RKS Amendment (the “**Supplemental Omnibus Objection**”), filed
12 contemporaneously herewith.¹

13 2. In my current position, I am responsible for overseeing the bankruptcy case
14 management component of AlixPartners’ assignment to assist the Reorganized Debtors with
15 various matters related to these Chapter 11 Cases. My areas of responsibility include (a) the effort
16 by AlixPartners, in coordination with the Reorganized Debtors, to review and assess the validity
17 of all claims asserted against the Debtors, other than Fire Claims and Subrogation Wildfire Claims,
18 and (b) providing support with respect to Securities Claims. I am generally familiar with the
19 Reorganized Debtors’ day-to-day operations, financing arrangements, business affairs, and books
20 and records. Except as otherwise indicated herein, all facts set forth in this Declaration are based
21 upon my personal knowledge, the knowledge of other AlixPartners professionals working under
22 and alongside me on this matter, my discussions with the Reorganized Debtors’ personnel and the
23 Reorganized Debtors’ various advisors and counsel, and my review of relevant documents and
24 information. If called upon to testify, I would testify competently to the facts set forth in this
25 Declaration. I am authorized to submit this Declaration on behalf of the Reorganized Debtors.

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28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
in the Supplemental Omnibus Objection.

1 3. The AlixPartners team under my supervision has been actively and intimately
2 involved in the claims review and reconciliation process. AlixPartners initially assisted the Debtors
3 in the preparation of their bankruptcy schedules based on the Debtors' books and records.
4 AlixPartners is now supporting, and will continue to support, the efforts of the Reorganized
5 Debtors and their counsel to resolve disputed claims, including by formal objections as necessary.

6 4. As part of the claims review and reconciliation process, the AlixPartners team,
7 working with the Reorganized Debtors' personnel and other professionals, identified a number of
8 proofs of claim that adopt, in whole or in part, the Second Amended Statement of Claim filed by
9 the law firm of Rolnick Kramer Sadighi LLP ("RKS") on behalf of the RKS Claimants.

10 5. The Supplemental Omnibus Objection is directed to the claims identified in
11 **Exhibit A** attached to the Supplemental Omnibus Objection, in the column headed "Claims to Be
12 Disallowed and Expunged." **Exhibit A** to the Supplemental Omnibus Objection was prepared by
13 the AlixPartners team under my overall supervision, and I am familiar with the document, its
14 contents, and the process under which it was prepared.

15 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
16 and correct to the best of my knowledge, information, and belief.

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18 Executed November 21, 2024 in Dallas, Texas.

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20 /s/ Robb McWilliams
21 Robb McWilliams
22 Managing Director
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